

EXHIBIT A



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

March 5, 2019

VIA EMAIL AND U.S. MAIL

Wesley G. Barr
The Olinde Firm, LLC
400 Poydras Street, Suite 1980
New Orleans, LA 70130
wbarr@olindefirm.com
folinde@olindefirm.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Mary Ruth Eva Turner (OBO Doyal Turner v. 3M Company et al Case No.: 0:16-cv-00521-JNE-DTS)

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

Plaintiffs' Last Name	Turner
Plaintiffs' First Name	Doyal C.
Case No.	16 - 00521
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	10
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	The Olinde Firm
I.03.e - Plaintiffs' Counsel's Email	wbarr@olindefirm.com



Benjamin W. Hulse
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December 21, 2018

VIA EMAIL AND U.S. MAIL

Arati C. Furness
Fears Nachawati, PLLC
5473 Blair Road
Dallas, TX 75231
mccarley@fnlawfirm.com
afurness@fnlawfirm.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Butler, Frances Eloise v. 3M Company et al Case No.: 0:18-cv-00758-JNE-DTS

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel

Plaintiffs' Last Name	Butler
Plaintiffs' First Name	Frances Eloise
Case No.	0:18-cv-00758-JNE-FLN
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	Incomplete
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Fears Nachawati, PLLC
I.03.e - Plaintiffs' Counsel's Email	mccarley@fnlawfirm.com



Benjamin W. Hulse
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E-Mail: bhulse@blackwellburke.com

January 11, 2019

VIA EMAIL AND U.S. MAIL

James Arthur Morris
Morris Law Firm
4111 W. Alameda Avenue, Suite 611
Burbank, CA 91505
jmorris@jamlawyers.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Manheim, Kathleen v. 3M Company et al Case No.: 0:18-cv-01456-JNE-DTS

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Manheim
Plaintiffs' First Name	Kathleen
Case No.	0:18-cv-01456
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	7
Section III (Surgery Information)	
Section III - Incomplete Questions	
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Morris Law Firm
I.03.e - Plaintiffs' Counsel's Email	sgreenberg@jamlawyers.com



Benjamin W. Hulse
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February 27, 2019

VIA EMAIL AND U.S. MAIL

Annesley H DeGaris
DeGaris & Rogers, LLC
Two North Twentieth Street, Suite 1030
Birmingham, AL 35203
adegaris@degarislaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Buddin, Glen et al v. 3M Company et al Case No.: 0:18-cv-02042-JNE-DTS

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Buddin
Plaintiffs' First Name	Glen
Case No.	0:18-cv-02042
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	7
Section III (Surgery Information)	
Section III - Incomplete Questions	
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	DeGaris & Rogers
I.03.e - Plaintiffs' Counsel's Email	adegaris@degarislaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

February 26, 2019

VIA EMAIL AND U.S. MAIL

Annesley H DeGaris
DeGaris & Rogers, LLC
Two North Twentieth Street, Suite 1030
Birmingham, AL 35203
adegar@degarislaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Peck, Suzanne v. 3M Company et al Case No.: 0:18-cv-02439-JNE-DTS

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Peck
Plaintiffs' First Name	Suzanne
Case No.	0:18-cv-02439
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01 02 03 06 07 08 09
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	Incomplete
Section IV - 10 (Drug/Alcohol)	Incomplete
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	Incomplete
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	DeGaris & Rogers, LLC
I.03.e - Plaintiffs' Counsel's Email	adegar@degarislaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

February 5, 2019

VIA EMAIL AND U.S. MAIL

Annesley H DeGaris
DeGaris & Rogers, LLC
Two North Twentieth Street, Suite 1030
Birmingham, AL 35203
adegaris@degarislaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Jones, Terry et al v. 3M Company et al Case No.: 0:18-cv-02548-JNE-DTS

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Jones
Plaintiffs' First Name	Terry
Case No.	0:18-cv-02548
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01 02 03 06 07 08 09
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	3
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	Incomplete
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	Incomplete
Section VI - 7 (3M/Arizant Communications)	Incomplete
Section VI - 8 (3M/Arizant Warranty)	Incomplete
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	Incomplete
Section IX - 4 (Married)	Incomplete
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	DeGaris & Rogers, LLC
I.03.e - Plaintiffs' Counsel's Email	adegarislaw@degarislaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

January 15, 2019

VIA EMAIL AND U.S. MAIL

David W. Hodges
Kennedy Hodges, LLP
4409 Montrose Blvd. Suite 200
Houston, TX, 77006
mtg.kennedyhodges.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Morgan, Daniel v. 3M Company et al Case No.: 0:18-cv-02740-JNE-DTS

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8; and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Morgan
Plaintiffs' First Name	Daniel
Case No.	18-cv-2740
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Kennedy Hodges, L.L.P.
I.03.e - Plaintiffs' Counsel's Email	mtg@kennedyhodges.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

January 31, 2019

VIA EMAIL AND U.S. MAIL

David W. Hodges
Kennedy Hodges, LLP
4409 Montrose Blvd. Suite 200
Houston, TX, 77006
mtg.kennedyhodges.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Marshall, Jeffrey v. 3M Company et al Case No.: 0:18-cv-02861-JNE-DTS

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

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Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Marshall
Plaintiffs' First Name	Jeffrey
Case No.	18-cv-2861
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
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Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Kennedy Hodges, L.L.P.
I.03.e - Plaintiffs' Counsel's Email	mtg@kennedyhodges.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

March 8, 2019

VIA EMAIL AND U.S. MAIL

David W. Hodges
Kennedy Hodges, LLP
4409 Montrose Blvd. Suite 200
Houston, TX, 77006
mtg.kennedyhodges.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Albert, Jr., Philip v. 3M Company et al Case No.: 0:18-cv-02938-JNE-DTS

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Albert
Plaintiffs' First Name	Phillip
Case No.	18-cv-2938
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01, 02, 03, 06, 08, 09 10, 11, 12, 13, 14, 15, 16
Section III (Surgery Information)	
Section III - Incomplete Questions	
Section IV - 1 (Vital Statistics)	Incomplete
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	Incomplete
Section IV - 10 (Drug/Alcohol)	Incomplete
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	Incomplete
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	Incomplete
Section VI - 7 (3M/Arizant Communications)	Incomplete
Section VI - 8 (3M/Arizant Warranty)	Incomplete
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	Incomplete
Section IX - 4 (Married)	Incomplete
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Kennedy Hodges, L.L.P.
I.03.e - Plaintiffs' Counsel's Email	mtg@kennedyhodges.com

EXHIBIT B



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

July 24, 2018

VIA EMAIL AND U.S. MAIL

David W. Hodges
Kennedy Hodges
4409 Montrose Blvd., Suite 200
Houston, TX 77006
mtg.kennedyhodges.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Sweezy, Richard v. 3M Company et al Case No.: 0:18-cv-01007-JNE-FLN

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Sweezy
Plaintiffs' First Name	Richard
Case No.	18-cv-1007
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Kennedy Hodges, L.L.P.
I.03.e - Plaintiffs' Counsel's Email	mtg@kennedyhodges.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

October 11, 2018

VIA EMAIL AND U.S. MAIL

James Arthur Morris
Morris Law Firm
4111 W. Alameda Avenue, Suite 611
Burbank, CA 91505
jmorris@jamlawyers.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Terrell, Elizabeth v. 3M Company et al Case No.: 18-cv-01654-JNE-DTS

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Terrell
Plaintiffs' First Name	Elizabeth
Case No.	0:18-cv-01654
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	02 10
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Morris Law Firm
I.03.e - Plaintiffs' Counsel's Email	sgreenberg@jamlawyers.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

December 12, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St - Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Lamb, David v. 3M Company 3M Company et al Case No.: 0:18-cv-01768-JNE-
FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel

Plaintiffs' Last Name	Lamb
Plaintiffs' First Name	David
Case No.	0:18-cv-01768
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	10
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01 03
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

December 13, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St - Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
McCray, Abraham v. 3M Company Case No.: 0:18-cv-01832-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	McCray
Plaintiffs' First Name	Abraham
Case No.	0:18-cv-01832
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

December 13, 2018

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St - Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Mussachia, Michael v. 3M Company Case No.: 0:18-cv-01833-JNE-DTS

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Mussachia
Plaintiffs' First Name	Michael
Case No.	0:18-cv-01833
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	07 10
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

December 3, 2018

VIA EMAIL AND U.S. MAIL

Daniel Christopher Burke
Bernstein Liebhard LLP
10 East 40th Street
New York, New York 10016
dburke@bernlieb.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
Johnson, Sheri v. 3M Company et al. Case No.: 0:18-cv-02014-JNE-DTS

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Johnson
Plaintiffs' First Name	Sheri
Case No.	18-cv-02014
Section I (Case Information)	Incomplete
Section I - Incomplete Questions	1
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	1
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	1
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	
I.03.b - Plaintiffs' Counsel's Firm	Bernstein Liebhard
I.03.e - Plaintiffs' Counsel's Email	dburke@bernlieb.com dweck@bernlieb.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

February 25, 2019

VIA EMAIL AND U.S. MAIL

Seth Webb
Brown & Crouppen, PC
211 North Broadway, Suite 1600
St. Louis, MO 63102
sethw@getbc.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Krzeminski, Joseph v. 3M Company et al Case No.: 0:18-cv-02168-JNE-DTS

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Krzeminski
Plaintiffs' First Name	Joseph
Case No.	0:18-cv-02168
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01, 02, 05, 06, 08, 09 10, 11, 12, 13, 14, 15 16
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01 02 03 04 05
Section IV - 1 (Vital Statistics)	Incomplete
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	Incomplete
Section IV - 10 (Drug/Alcohol)	Incomplete
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	Incomplete
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	Incomplete
Section VI - 7 (3M/Arizant Communications)	Incomplete
Section VI - 8 (3M/Arizant Warranty)	Incomplete
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	Incomplete
Section IX - 4 (Married)	Incomplete
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Brown Incomplete Crouppen
I.03.e - Plaintiffs' Counsel's Email	sethw@getbc.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

January 31, 2019

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St - Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Monroe, Trena v. 3M Company Case No.: 0:18-cv-02469-JNE-DTS

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Monroe
Plaintiffs' First Name	Trena
Case No.	0:18-cv-02469
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	
Section II - Incomplete Questions	
Section III (Surgery Information)	
Section III - Incomplete Questions	
Section IV - 1 (Vital Statistics)	
Section IV - 3 (Healthcare Providers)	
Section IV - 7 (Pharmacies/Drugstores)	
Section IV - 8 (Dental Procedures)	
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	
Section V - 4 (Disability Claims)	
Section V - 5 (Lawsuits)	
Section V - 6 (Bankruptcy)	
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	
Section VI - 7 (3M/Arizant Communications)	
Section VI - 8 (3M/Arizant Warranty)	
Section VI - 9 (Augustine)	
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

March 13, 2019

VIA EMAIL AND U.S. MAIL

Daniel A. Nigh
Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
316 S Baylen St - Ste 600
Pensacola, FL 32502
dnigh@levinlaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet
Ritzler, Pamela v. 3M Company Case No.: 0:18-cv-02540-JNE-DTS

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is the final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	Ritzler
Plaintiffs' First Name	Pamela
Case No.	0:18-cv-02540
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01, 02, 03 05, 06, 08 09, 10, 11 12, 13, 14 15, 16
Section III (Surgery Information)	Incomplete
Section III - Incomplete Questions	01, 02 03, 04 05
Section IV - 1 (Vital Statistics)	Incomplete
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	Incomplete
Section IV - 10 (Drug/Alcohol)	Incomplete
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	Incomplete
Section VI - 1 (Physical Injury)	Incomplete
Section VI - 3 (Emotional Distress)	Incomplete
Section VI - 6 (Warnings)	Incomplete
Section VI - 7 (3M/Arizant Communications)	Incomplete
Section VI - 8 (3M/Arizant Warranty)	Incomplete
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	Incomplete
Section VII - 2 (Lost Future Wages)	Incomplete
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	Incomplete
Section IX - 3 (Residences)	Incomplete
Section IX - 4 (Married)	Incomplete
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	Levin, Papantonio, Thomas, Mitchell, Rafferty, Proctor P.A.
I.03.e - Plaintiffs' Counsel's Email	dnigh@levinlaw.com



Benjamin W. Hulse
Direct Dial: 612-343-3256
E-Mail: bhulse@blackwellburke.com

February 7, 2019

VIA EMAIL AND U.S. MAIL

Noah C. Lauricella
GoldenbergLaw, PLLC
800 LaSalle Avenue, Suite 2150
Minneapolis, MN 55402
nlauricella@goldenberglaw.com

Re: *In re Bair Hugger Forced Air Warming Devices Products Liability Litigation*
MDL No. 2666 – Deficiencies in Plaintiff Fact Sheet for Individual Case
O'Donnell, Ellen v. 3M Company et al Case No.: 0:18-cv-02926-JNE-DTS

Dear Counsel:

We are in receipt of the Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as “a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations.” Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: “If a question is not applicable to you, please state ‘Not Applicable’ or ‘N/A.’” In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a revised, verified PFS through Plaintiffs’ portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff’s portal, you do not need to resubmit documents that were previously served with the original PFS. This is a final deficiency notice for this matter.

Sincerely,

s/ Benjamin W. Hulse

Benjamin W. Hulse

cc: Plaintiffs’ Co-Lead Counsel
Enclosure

Plaintiffs' Last Name	O'Donnell
Plaintiffs' First Name	Ellen
Case No.	0:18-cv-2926
Section I (Case Information)	
Section I - Incomplete Questions	
Section II (Personal Information)	Incomplete
Section II - Incomplete Questions	01, 02, 05, 06, 07, 08, 09, 11, 12, 13, 14, 15, 16
Section III (Surgery Information)	
Section III - Incomplete Questions	
Section IV - 1 (Vital Statistics)	Incomplete
Section IV - 3 (Healthcare Providers)	Incomplete
Section IV - 7 (Pharmacies/Drugstores)	Incomplete
Section IV - 8 (Dental Procedures)	Incomplete
Section IV - 9 (Tobacco)	
Section IV - 10 (Drug/Alcohol)	Incomplete
Section V - 4 (Disability Claims)	Incomplete
Section V - 5 (Lawsuits)	Incomplete
Section V - 6 (Bankruptcy)	Incomplete
Section VI - 1 (Physical Injury)	
Section VI - 3 (Emotional Distress)	
Section VI - 6 (Warnings)	Incomplete
Section VI - 7 (3M/Arizant Communications)	Incomplete
Section VI - 8 (3M/Arizant Warranty)	Incomplete
Section VI - 9 (Augustine)	Incomplete
Section VII - 1 (Lost Past Wages)	
Section VII - 2 (Lost Future Wages)	
Section VIII - 2 (Verbal/Written Statement)	Incomplete
Section IX - 1 (Consortium Name etc.)	
Section IX - 3 (Residences)	
Section IX - 4 (Married)	
X.01 - Signed Authorization	Incomplete
X.02.d - Documents - Signed Verification	Incomplete
I.03.b - Plaintiffs' Counsel's Firm	GoldenbergLaw, PLLC
I.03.e - Plaintiffs' Counsel's Email	nlauricella@goldenberglaw.com

EXHIBIT C

From: Ben Hulse

Sent: Friday, April 12, 2019 1:16 PM

To: [JoanEricksen Chambers@mnd.uscourts.gov](mailto:JoanEricksen_Chambers@mnd.uscourts.gov); schultz_chambers@mnd.uscourts.gov

Cc: Jerry Blackwell <blackwell@blackwellburke.com>; Bridget Ahmann <Bridget.Ahmann@FaegreBD.com>; gzimmerman@meshbesh.com; bgordon@levinlaw.com; MVC@ciresiconlin.com; JMC@CiresiConlin.com; David J. Szerlag <david@pritzkerlaw.com>; Wendy Thayer <wendy@pritzkerlaw.com>

Subject: Bair Hugger, MDL 2666 -- Defendants' lists of PFS disputes for April 2019

Dear Judge Ericksen,

Although this month's status conference has been cancelled, Defendants would still like to list cases with Plaintiff Fact Sheet disputes, as provided by PTO 14, paragraph 7, Dkt. No. 117.

The spreadsheets with the lists of disputed cases are attached.

Best regards,

Ben Hulse

Counsel for Defendants

Benjamin W. Hulse
Blackwell Burke P.A.
431 South Seventh Street, Suite 2500
Minneapolis, MN 55415
Direct (612) 343-3256
Fax (612) 343-3205

This message and any attachments may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If you are not the intended recipient or are not authorized to receive for the recipient, you are hereby notified that dissemination, distribution or copying of this message and any attachments is strictly prohibited. If you have received this message in error, please immediately advise the sender by reply e-mail and delete the message and any attachments. Thank you.

Defendants' PFS List 1: Overdue Plaintiff Fact Sheets
(Updated April 12, 2019)

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
0:18-cv-02067-JNE-DTS	Norton, Lloyd v. 3M Company et al	7/20/2018	10/18/2018	11/9/2018 12/14/2018 1/11/2019 2/15/2019 3/15/2019	Meshbesher & Spence
0:18-cv-02082-JNE-DTS	English, Alfred v. 3M Company et al	7/20/2018	10/18/2018	11/9/2018 12/14/2018 1/11/2019 2/15/2019 3/15/2019	Kennedy Hodges, LLP
0:18-cv-02087-JNE-DTS	Bellach, (Dimesa, Maria) v. 3M Company	7/23/2018	10/21/2018	11/9/2018 12/14/2018 1/11/2019 2/15/2019 3/15/2019	Napoli Bern Ripka Shkolnik LLP
0:18-cv-02095-JNE-DTS	Jenkins, Carole v. 3M Company et al	7/23/2018	10/21/2018	1/11/2019 2/15/2019 3/15/2019	Bachus & Schanker, LLC
0:18-cv-02117-JNE-DTS	Banks, Annina v. 3M Company et al	7/24/2018	10/22/2018	11/9/2018 12/14/2018 1/11/2019 2/15/2019 3/15/2019	The Miller Firm, LLC
0:18-cv-02394-JNE-DTS	Block, William v. 3M Company et al	8/15/2018	11/13/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019	Law Offices of Travis Walker, PA
0:17-cv-01195-JNE-DTS	Arthur Jay Edmunds (McArthur) v. 3M Company et al	4/17/2017	12/10/2018	2/15/2019 3/15/2019	The Olinde Firm, LLC
0:18-cv-03011-JNE-DTS	Jones, Tyrone v. 3M Company et al	10/25/2018	1/23/2019	2/15/2019 3/15/2019	The Miller Firm, LLC
0:18-cv-03014-JNE-DTS	Sosebee, Sylvia et al v. 3M Company et al	10/26/2018	1/24/2019	2/15/2019 3/15/2019	Meshbesher & Spence
0:18-cv-03229-JNE-DTS	Patillo, Wendy v. 3M Company et al	11/20/2018	2/18/2019	3/15/2019	Meshbesher & Spence
0:18-cv-03295-JNE-DTS	Gilmore, Denise v. 3M Company et al	11/30/2018	2/28/2019	3/15/2019	Davis & Crump, P.C.
0:18-cv-03297-JNE-DTS	Cromartie, Beverly v. 3M Company et al	11/30/2018	2/28/2019	3/15/2019	Davis & Crump, P.C.

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 117).

Pink highlighting Indicates that the case is subject to Defendants' Pending Motion to Dismiss (Dkt. No. 1828).

Defendants' PFS List 1: Overdue Plaintiff Fact Sheets
(Updated April 12, 2019)

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
0:18-cv-03322-JNE-DTS	Melancon, Nancy et al v. 3M Company et al	12/4/2018	3/4/2019	3/15/2019	Fears Nachawati, PLLC
0:18-cv-03323-JNE-DTS	Thompson, Linda v. 3M Company et al	12/4/2018	3/4/2019	3/15/2019	Fears Nachawati, PLLC
0:18-cv-03328-JNE-DTS	Milioto, Andrea et al v. 3M Company et al	12/5/2018	3/5/2019	3/15/2019	Fears Nachawati, PLLC
0:18-cv-03329-JNE-DTS	McAlister, Max et al v. 3M Company et al	12/5/2018	3/5/2019	3/15/2019	Fears Nachawati, PLLC
0:18-cv-03330-JNE-DTS	Brown, Karmaletha v. 3M Company et al	12/5/2018	3/5/2019	3/15/2019	Fears Nachawati, PLLC
0:18-cv-03332-JNE-DTS	Drake, Charlie et al v. 3M Company et al	12/5/2018	3/5/2019	3/15/2019	Fears Nachawati, PLLC
0:18-cv-02289-JNE-DTS	Leane C. Priest, (Hiser, Harold) v. 3M Company et al	8/6/2018	3/4/2019		Kennedy Hodges, LLP
0:18-cv-02914-JNE-DTS	Chiavaroli, Ann v. 3M Company et al	10/11/2018	1/9/2019		Fears Nachawati, PLLC
0:18-cv-03368-JNE-DTS	Bowden, Carrol v. 3M Company et al	12/11/2018	3/11/2019		Morris Law Firm
0:18-cv-03379-JNE-DTS	Bonn, Carroll v. 3M Company et al	12/12/2018	3/12/2019		Brown & Crouppen, PC
0:18-cv-03448-JNE-DTS	Cassell, Robin et al v. 3M Company et al	12/20/2018	3/20/2019		Meshbesher & Spence
0:18-cv-03450-JNE-DTS	Alexander, Milton v. 3M Company et al	12/21/2018	3/21/2019		Sanders Phillips Grossman
0:18-cv-03464-JNE-DTS	Van Haitsma, Timothy v. 3M Company et al	12/24/2018	3/24/2019		Kirtland & Packard LLP
0:19-cv-00011-JNE-DTS	Cruz, Nancy v. 3M Company et al	1/3/2019	4/4/2019		The Olinde Firm, LLC
0:19-cv-00020-JNE-DTS	Holmes, Michael v. 3M Company et al	1/4/2019	4/5/2019		Meshbesher & Spence
0:19-cv-00030-JNE-DTS	Jenkins, laVonne v. 3M Company et al	1/5/2019	4/6/2019		Kirtland & Packard LLP

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 117).

Pink highlighting Indicates that the case is subject to Defendants' Pending Motion to Dismiss (Dkt. No. 1828).

Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices
(Updated April, 9, 2019)

Case Number	Title	1st Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:18-cv-01542-JNE-DTS	Davis, Harry v. 3M Company et al	12/3/2018	12/24/2018	1/11/2019 2/15/2019 3/15/2019	Schlichter Bogard & Denton, LLP
0:18-cv-01722-JNE-DTS	Woodard, George v. 3M Company et al	10/1/2018	10/22/2018	11/9/2018 12/14/2018 1/11/2019 2/15/2019 3/15/2019	Pendley, Baudin & Coffin L.L.P.
0:18-cv-01724-JNE-DTS	Cooper, Roy et al v. 3M Company et al	10/15/2018	11/5/2018	11/9/2018 12/14/2018 1/11/2019 2/15/2019 3/15/2019	Pendley, Baudin & Coffin L.L.P.
0:18-cv-02065-JNE-DTS	Sullivan, Jeffrey v. 3M Company et al	11/20/2018	12/11/2018	1/11/2019 2/15/2019 3/15/2019	Kennedy Hodges, LLP
0:18-cv-02080-JNE-DTS	McGuire, Maria v. 3M Company et al	11/15/2018	12/6/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019	Kennedy Hodges, LLP
0:18-cv-00572-JNE-DTS	Gauthier, Kim v. 3M Company et al	10/15/2018	11/15/2018	11/9/2018 12/14/2018 1/11/2019 2/15/2019 3/15/2019	Schlichter, Bogard & Denton, LLP
0:18-cv-02225-JNE-DTS	Harris, Gloria v. 3M Company et al	11/20/2018	12/11/2018	1/11/2019 2/15/2019 3/15/2019	Brown & Crouppen, PC
0:18-cv-02421-JNE-DTS	Miranda, Elsa v. 3M Company et al	1/16/2019	2/6/2019	2/15/2019 3/15/2019	Bernstein Liebhard LLP
0:18-cv-02437-JNE-DTS	Gentry, Ronald v. 3M Company et al	2/5/2019	2/26/2019	3/15/2019	DeGaris & Rogers, LLC
0:18-cv-02463-JNE-DTS	Baggett, Marcia et al v. 3M Company et al	2/5/2019	2/26/2019	3/15/2019	DeGaris & Rogers, LLC
0:18-cv-02467-JNE-DTS	McMillon, Anna v. 3M Company et al	12/19/2018	1/9/2019	2/15/2019 3/15/2019	Kennedy Hodges, LLP
0:18-cv-02548-JNE-DTS	Jones, Terry et al v. 3M Company et al	2/5/2019	2/26/2019	3/15/2019	DeGaris & Rogers, LLC
0:18-cv-02718-JNE-DTS	Skaggs, Larry v. 3M Company et al	2/5/2019	2/26/2019	3/15/2019	Johnston Law Group

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 117).

Pink highlighting Indicates that the case is subject to Defendants' Pending Motion to Dismiss (Dkt. No. 1828).

Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices

(Updated April, 9, 2019)

0:18-cv-02719-JNE-DTS	Leos, Julian v. 3M Company et al	2/5/2019	2/26/2019	3/15/2019	Johnston Law Group
0:18-cv-02740-JNE-DTS	Morgan, Daniel v. 3M Company et al	1/16/2019	2/6/2019	2/15/2019 3/15/2019	Kennedy Hodges, LLP
0:18-cv-02861-JNE-DTS	Marshall, Jeffrey v. 3M Company et al	1/31/2019	2/21/2019	3/15/2019	Kennedy Hodges, LLP
0:18-cv-03384-JNE-DTS	Hawkins, Deana v. 3M Company et al	2/8/2019	3/1/2019	3/15/2019	Justinian & Associates PLLC
0:16-cv-00521-JNE-DTS	Mary Ruth Eva Turner (Doyal Turner) v. 3M Company	3/15/2019	4/5/2019		The Olinde Firm, LLC
0:18-cv-02439-JNE-DTS	Peck, Suzanne v. 3M Company et al	2/26/2019	3/19/2019		DeGaris & Rogers, LLC
0:18-cv-02461-JNE-DTS	Galland-Corley, Rita v. 3M Company et al	2/20/2019	3/13/2019		Bernstein Liebhard LLP
0:18-cv-02934-JNE-DTS	Fairfax, Kimberly v. 3M Company et. al.	3/5/2019	3/26/2019		Bernstein Liebhard LLP
0:18-cv-02938-JNE-DTS	Albert, Jr., Philip v. 3M Company et al	3/8/2019	3/29/2019		Kennedy Hodges, LLP
0:18-cv-03045-JNE-DTS	Woods, Parker v. 3M Company et al	2/26/2019	3/19/2019		Gustafson Gluek PLLC
Case Number	Title	2nd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:17-cv-00088-JNE-DTS	Malinski, Michael v. 3M Company et al	11/7/2018	11/28/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019	Gustafson Gluek PLLC
0:17-cv-03899-JNE-DTS	Pimentel, Carlos v. 3M Company et al	2/28/2017	3/20/2019	5/12/2018 6/15/2018 11/9/2018	The Olinde Firm, LLC
0:18-cv-00758-JNE-DTS	Butler, Frances Eloise v. 3M Company et al	12/21/2018	1/11/2019	2/15/2019 3/15/2019	Fears Nachawati, PLLC
0:18-cv-01634-JNE-DTS	Otero, Brenda v. 3M Company et al	12/4/2018	12/25/2018	1/11/2019 2/15/2019 3/15/2019	Kennedy Hodges, LLP
0:18-cv-01753-JNE-DTS	McCloat, Kenneth v. 3M Company et al	1/2/2019	1/23/2018	2/15/2019 3/15/2019	Kennedy Hodges, LLP

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 117).

Pink highlighting Indicates that the case is subject to Defendants' Pending Motion to Dismiss (Dkt. No. 1828).

Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices

(Updated April, 9, 2019)

0:18-cv-02063-JNE-DTS	Hogue, Anthony v. 3M Company et al	1/14/2019	2/4/2019	2/15/2019 3/15/2019	Kennedy Hodges, LLP
0:18-cv-02096-JNE-DTS	Alexander, Charles et al v. 3M Company et al	1/29/2019	2/19/2019	3/15/2019	Bachus & Schanker, LLC
0:18-cv-02380-JNE-DTS	Foudray, Robert v. 3M Company et al	1/29/2019	2/19/2019	3/15/2019	Kennedy Hodges, LLP
0:18-cv-02042-JNE-DTS	Buddin, Glen et al v. 3M Company et al	2/27/2019	3/20/2019		DeGaris & Rogers, LLC
0:18-cv-02061-JNE-DTS	Oederken, Cindy v. 3M Company et al	3/6/2019	3/27/2019		Kennedy Hodges, LLP
0:18-cv-02626-JNE-DTS	Pilcher, Sonja v. 3M Company et al	2/21/2019	3/14/2019		Langdon and Emison
0:18-cv-02665-JNE-DTS	Romero, Tammy v. 3M Company et al	3/12/2019	4/2/2019		Kennedy Hodges, LLP
Case Number	Title	3rd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:18-cv-01456-JNE-DTS	Manheim, Kathleen v. 3M Company et al	1/11/2019	2/1/2019	3/15/2019	Morris Law Firm

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 117).

Pink highlighting Indicates that the case is subject to Defendants' Pending Motion to Dismiss (Dkt. No. 1828).

Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response
(Updated April 9, 2019)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-00852-JNE-DTS	Villafranco, Leonard v. 3M Company et al	8/7/2018	11/9/2018 12/14/2018 1/11/2019 2/15/2019 3/15/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-01051-JNE-DTS	Johnson, Alvin v. 3M Company	11/15/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-01103-JNE-DTS	Tedford, Louise v. 3M Company	8/17/2018	11/9/2018 12/14/2018 1/11/2019 2/15/2019 3/15/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01167-JNE-DTS	Eans, James v. 3M Company	8/24/2018	11/9/2018 12/14/2018 1/11/2019 2/15/2019 3/15/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01169-JNE-DTS	Gregory, Janice v. 3M Company	12/3/2018	2/15/2019 3/15/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
18-cv-01654-JNE-DTS	Terrell, Elizabeth v. 3M Company et al	10/11/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019	Morris Law Firm
0:15-cv-03950-JNE-DTS	LeBlanc, John (Shirley Thibodeaux) v. 3M Company et al	10/8/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019	Law Offices of Travis Walker, PA
0:17-cv-00712-JNE-DTS	Haladay, Jeffrey (OBO Harold Owens) v. 3M Company	8/3/2018	11/9/2018 12/14/2018 1/11/2019 2/15/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-03573-JNE-DTS	Parker, Lloyd v. 3M Company et al	10/11/2018	1/11/2019 2/15/2019 3/15/2019	Bernstein Liebhard LLP
0:17-cv-04476-JNE-DTS	Holstine, Rachel v. 3M Company et al	9/12/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019	Bernstein Liebhard LLP

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Pink highlighting Indicates that the case is subject to Defendants' Pending Motion to Dismiss (Dkt. No. 1828).

Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response
(Updated April 9, 2019)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:17-cv-04889-JNE-DTS	Thornton, Mildred v. 3M Company et al	12/4/2018	3/15/2019	Bernstein Liebhard LLP
0:17-cv-05261-JNE-DTS	Hardy, Alan v. 3M Company et al	12/4/2018	3/15/2019	Bernstein Liebhard LLP
0:18-cv-00205-JNE-DTS	Shulz, Shelley v. 3M Company et al	10/16/2018	2/15/2019 3/15/2019	Bernstein Liebhard LLP
0:18-cv-00354-JNE-DTS	McDermott, Kevin et al v. 3M Company et al	8/31/2018	11/9/2018 12/14/2018	Parker Waichman
0:18-cv-00670-JNE-DTS	Darwick, Robert v. 3M Company	7/18/2018	8/10/2018 9/17/2018 10/12/2018 11/9/2018 12/14/2018 1/11/2019 2/15/2019 3/15/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00691-JNE-DTS	Hauser, Michael v. 3M Company	6/29/2018	8/10/2018 9/17/2018 10/12/2018 11/9/2018 12/14/2018 1/11/2019 2/15/2019 3/15/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00724-JNE-DTS	Burr, Cody v. 3M Company et al	12/21/2018	2/15/2019 3/15/2019	Morris Law Firm
0:18-cv-00856-JNE-DTS	Negron, Angel v. 3M Company et al	2/6/2019	3/15/2019	The Law offices of Travis R. Walker, P.A.
0:18-cv-00998-JNE-DTS	Caison, John et al v. 3M Company et al	8/22/2018	12/14/2018 1/11/2019 2/15/2019	Gustafson Gluek PLLC
0:18-cv-01007-JNE-DTS	Sweezy, Richard v. 3M Company et al	7/24/2018	10/12/2018 11/9/2018 12/14/2018 1/11/2019 2/15/2019	Kennedy Hodges

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Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response
(Updated April 9, 2019)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-01098-JNE-DTS	Rodliff, Peter v. 3M Company	8/15/2018	10/12/2018 11/9/2018 12/14/2018 1/11/2019 2/15/2019 3/15/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01121-JNE-DTS	Stapley, William v. 3M Company	8/16/2018	11/9/2018 12/14/2018 1/11/2019 2/15/2019 3/15/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01130-JNE-DTS	Deloach, Marsha v. 3M Company et al	8/30/2018	11/9/2018 12/14/2018 1/11/2019 2/15/2019 3/15/2019	The Miller Firm, LLC
0:18-cv-01505-JNE-DTS	Cerbins, Rosemary v. 3M Company	7/24/2018	10/12/2018 11/9/2018 12/14/2018 1/11/2019 2/15/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01567-JNE-DTS	Gillis, Stanley v. 3M Company et al	11/1/2018	2/15/2019 3/15/2019	Kennedy Hodges, LLP
0:18-cv-01725-JNE-DTS	Heyward, Jacqueline v. 3M Company et al	10/15/2018	1/11/2019 2/15/2019 3/15/2019	Kennedy Hodges, LLP
0:18-cv-01766-JNE-DTS	Schoolman, Dale v. 3M Company et al	12/11/2018	2/15/2019 3/15/2019	GoldenbergLaw, PLLC
0:18-cv-01768-JNE-DTS	Lamb, David v. 3M Company 3M Company et al	12/12/2018	2/15/2019 3/15/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01769-JNE-DTS	McCoy, Ethel v. 3M Company	8/14/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01771-JNE-DTS	Royal, Deborah v. 3M Company 3M Company et al	10/8/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA

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Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response
(Updated April 9, 2019)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-01832-JNE-DTS	McCray, Abraham v. 3M Company	12/13/2018	2/15/2019 3/15/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01833-JNE-DTS	Mussachia, Michael v. 3M Company	12/13/2018	2/15/2019 3/15/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01875-JNE-DTS	Byrge, Gary v. 3M Company et al	12/12/2018	2/15/2019 3/15/2019	Morris Law Firm
0:18-cv-02062-JNE-DTS	Pascucci, Michael v. 3M Company et al	11/15/2018	1/11/2019 2/15/2019 3/15/2019	Kennedy Hodges, LLP
0:18-cv-02099-JNE-DTS	O'Neal, John v. 3M Company et al	11/15/2018	1/11/2019 2/15/2019 3/15/2019	Kennedy Hodges, LLP
0:18-cv-02102-JNE-DTS	Porter, Kathleen v. 3M Company et al	11/15/2018	1/11/2019 2/15/2019 3/15/2019	Kennedy Hodges, LLP
0:18-cv-02223-JNE-DTS	Tucker, Frank v. 3M Company et al	11/20/2018	2/15/2019 3/15/2019	Kennedy Hodges, LLP
0:18-cv-02236-JNE-DTS	Popielarz, Troy v. 3M Company et al	11/20/2018	2/15/2019 3/15/2019	Kennedy Hodges, LLP
0:18-cv-02263-JNE-DTS	Wenzel, David v. 3M Company et al	11/20/2018	2/15/2019 3/15/2019	Kennedy Hodges, LLP
0:18-cv-02367-JNE-DTS	Bailey, Peter v. 3M Company et al	12/17/2018	2/15/2019 3/15/2019	Kennedy Hodges, LLP
0:18-cv-02469-JNE-DTS	Monroe, Trena v. 3M Company	12/4/2018	3/15/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor,
Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-00141-JNE-DTS	Jacob Fox (Fox, Dean) v. 3M Company et al	2/27/2019		Langdon and Emison

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Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response

(Updated April 9, 2019)

0:18-cv-00628-JNE-DTS	Boyle, Richard (Maureen) v. 3M Company et al	2/4/2019		Langdon and Emison
0:18-cv-01708-JNE-DTS	Keller, Kenneth v. 3M Company et al	2/13/2019		The Miller Firm, LLC
0:18-cv-02014-JNE-DTS	Johnson, Sheri v. 3M Company et al.	12/3/2018		Bernstein Liebhard LLP
0:18-cv-02168-JNE-DTS	Krzeminski, Joseph v. 3M Company et al	2/25/2019		Brown & Crouppen, PC
0:18-cv-02535-JNE-DTS	Guest, Gregory v. 3M Company	1/31/2019		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-02540-JNE-DTS	Ritzler, Pamela v. 3M Company	3/13/2019		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-02776-JNE-DTS	Brown, Hubert v. 3M Company	2/13/2019		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-02787-JNE-DTS	Willis, Walter v. 3M Company	2/20/2019		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-02926-JNE-DTS	O'Donnell, Ellen v. 3M Company et al	2/7/2019		GoldenbergLaw, PLLC
0:18-cv-02947-JNE-DTS	Flenoy, Debra v. 3M Company et al	2/12/2019		GoldenbergLaw, PLLC
0:18-cv-03042-JNE-DTS	Johnson, Albert Charles v. 3M Company et al	2/14/2019		Showard Law Firm, P.C.

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EXHIBIT D

From: Ben Hulse

Sent: Friday, May 10, 2019 1:49 PM

To: [JoanEricksen Chambers@mnd.uscourts.gov](mailto:JoanEricksen_Chambers@mnd.uscourts.gov); [schultz chambers@mnd.uscourts.gov](mailto:schultz_chambers@mnd.uscourts.gov)

Cc: Jerry Blackwell <blackwell@blackwellburke.com>; Bridget Ahmann <Bridget.Ahmann@FaegreBD.com>; gzimmerman@meshbesh.com; bgordon@levinlaw.com; MVC@ciresiconlin.com; JMC@CiresiConlin.com; David J. Szerlag <david@pritzkerlaw.com>; Wendy Thayer <wendy@pritzkerlaw.com>

Subject: Bair Hugger, MDL 2666 -- Defendants' lists of PFS disputes for May 2019

Dear Judge Ericksen,

Although this month's status conference has been cancelled, Defendants would still like to list cases with Plaintiff Fact Sheet disputes, as provided by PTO 14, paragraph 7, Dkt. No. 117.

The spreadsheets with the lists of disputed cases are attached.

Best regards,

Ben Hulse

Counsel for Defendants

Benjamin W. Hulse
Blackwell Burke P.A.
431 South Seventh Street, Suite 2500
Minneapolis, MN 55415
Direct (612) 343-3256
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Defendants' PFS List 1: Overdue Plaintiff Fact Sheets
(Updated May 10, 2019)

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
0:18-cv-02082-JNE-DTS	English, Alfred v. 3M Company et al	7/20/2018	10/18/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019 4/12/2019	Kennedy Hodges, LLP
0:17-cv-01195-JNE-DTS	Arthur Jay Edmunds (McArthur) v. 3M Company et al	4/17/2017	12/10/2018	2/15/2019 3/15/2019 4/12/2019	The Olinde Firm, LLC
0:18-cv-02289-JNE-DTS	Leane C. Priest, (Hiser, Harold) v. 3M Company et al	8/6/2018	3/4/2019	4/12/2019	Kennedy Hodges, LLP
0:18-cv-02914-JNE-DTS	Chiavaroli, Ann v. 3M Company et al	10/11/2018	1/9/2019	4/12/2019	Fears Nachawati, PLLC
0:18-cv-03011-JNE-DTS	Jones, Tyrone v. 3M Company et al	10/25/2018	1/23/2019	2/15/2019 3/15/2019 4/12/2019	The Miller Firm, LLC
0:18-cv-03229-JNE-DTS	Patillo, Wendy v. 3M Company et al	11/20/2018	2/18/2019	3/15/2019 4/12/2019	Meshbesher & Spence
0:18-cv-03322-JNE-DTS	Melancon, Nancy et al v. 3M Company et al	12/4/2018	3/4/2019	3/15/2019 4/12/2019	Fears Nachawati, PLLC
0:18-cv-03323-JNE-DTS	Thompson, Linda v. 3M Company et al	12/4/2018	3/4/2019	3/15/2019 4/12/2019	Fears Nachawati, PLLC
0:18-cv-03328-JNE-DTS	Milioto, Andrea et al v. 3M Company et al	12/5/2018	3/5/2019	3/15/2019 4/12/2019	Fears Nachawati, PLLC
0:18-cv-03329-JNE-DTS	Mcalister, Max et al v. 3M Company et al	12/5/2018	3/5/2019	3/15/2019 4/12/2019	Fears Nachawati, PLLC
0:18-cv-03330-JNE-DTS	Brown, Ramnaretna v. 3M Company et al	12/5/2018	3/5/2019	3/15/2019 4/12/2019	Fears Nachawati, PLLC
0:18-cv-03332-JNE-DTS	Drake, Charlie et al v. 3M Company et al	12/5/2018	3/5/2019	3/15/2019 4/12/2019	Fears Nachawati, PLLC
0:18-cv-03368-JNE-DTS	Bowden, Carrol v. 3M Company et al	12/11/2018	3/11/2019	4/12/2019	Morris Law Firm
0:18-cv-03448-JNE-DTS	Cassell, Robin et al v. 3M Company et al	12/20/2018	3/20/2019	4/12/2019	Meshbesher & Spence
0:19-cv-00011-JNE-DTS	Cruz, Nancy v. 3M Company et al	1/3/2019	4/4/2019	4/12/2019	The Olinde Firm, LLC

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 117).

Pink highlighting Indicates that the case is subject to Defendants' Pending Motion to Dismiss (Dkt. No. 1828).

Defendants' PFS List 1: Overdue Plaintiff Fact Sheets
(Updated May 10, 2019)

Case Number	Title	Date Filed	Due Date	Prior Listing	Firm Name
0:19-cv-00020-JNE-DTS	Holmes, Michael v. 3M Company et al	1/4/2019	4/5/2019	4/12/2019	Meshbesher & Spence
0:17-cv-03335-JNE-DTS	Thomas L. Marsh, (Marsh, Judy) v. 3M Company et al	7/26/2017	4/30/2019		Kennedy Hodges, LLP
0:19-cv-00050-JNE-DTS	New, Louis Jr. v. 3M Company et al	1/9/2019	4/9/2019		Fears Nachawati, PLLC
0:19-cv-00052-JNE-DTS	Shookhoff, Mary et al v. 3M Company et al	1/9/2019	4/9/2019		Fears Nachawati, PLLC
0:19-cv-00093-JNE-DTS	Rossetti, Kim et al v. 3M Company et al	1/14/2019	4/14/2019		Meshbesher & Spence
0:19-cv-00108-JNE-DTS	Douglas, Johnny v. 3M Company et al	1/15/2019	4/15/2019		Meshbesher & Spence
0:19-cv-00123-JNE-DTS	Smith, Samuel v. 3M Company et al	1/16/2019	4/16/2019		Kennedy Hodges, LLP
0:19-cv-00239-JNE-DTS	Powell, Tonya v 3M Company et al	2/1/2019	5/2/2019		Bernstein Liebhard LLP

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Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices
(Updated May 10, 2019)

Case Number	Title	1st Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:18-cv-02065-JNE-DTS	Sullivan, Jeffrey v. 3M Company et al	11/20/2018	12/11/2018	1/11/2019 2/15/2019 3/15/2019 4/12/2019	Kennedy Hodges, LLP
0:16-cv-00521-JNE-DTS	Mary Ruth Eva Turner (Doyal Turner) v. 3M Company	3/15/2019	4/5/2019	4/12/2019	The Olinde Firm, LLC
0:18-cv-00572-JNE-DTS	Gauthier, Kim v. 3M Company et al	10/15/2018	11/15/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019 4/12/2019	Schlichter, Bogard & Denton, LLP
0:18-cv-02439-JNE-DTS	Peck, Suzanne v. 3M Company et al	2/26/2019	3/19/2019	4/12/2019	DeGaris & Rogers, LLC
0:18-cv-02467-JNE-DTS	McMillon, Anna v. 3M Company et al	12/19/2018	1/9/2019	2/15/2019 3/15/2019 4/12/2019	Kennedy Hodges, LLP
0:18-cv-02548-JNE-DTS	Jones, Terry et al v. 3M Company et al	2/5/2019	2/26/2019	3/15/2019 4/12/2019	DeGaris & Rogers, LLC
0:18-cv-02740-JNE-DTS	Morgan, Daniel v. 3M Company et al	1/16/2019	2/6/2019	2/15/2019 3/15/2019 4/12/2019	Kennedy Hodges, LLP
0:18-cv-02861-JNE-DTS	Marshall, Jeffrey v. 3M Company et al	1/31/2019	2/21/2019	3/15/2019 4/12/2019	Kennedy Hodges, LLP
0:18-cv-02938-JNE-DTS	Albert, Jr., Philip v. 3M Company et al	3/8/2019	3/29/2019	4/12/2019	Kennedy Hodges, LLP
0:18-cv-03045-JNE-DTS	Woods, Parker v. 3M Company et al	2/26/2019	3/19/2019	4/12/2019	Gustafson Gluek PLLC
0:18-cv-02087-JNE-DTS	Benach, Dimesa, Maria) v. 3M Company	4/16/2019	5/7/2019		Napoli Bern Ripka Shkolnik LLP
0:18-cv-02509-JNE-DTS	Guillory, Yvonne v. 3M Company et al	4/4/2019	4/25/2019		The Olinde Firm, LLC
0:18-cv-02717-JNE-DTS	Newcomb, Renee v. 3M Company et al	2/5/2019	2/26/2019		Johnston Law Group
0:18-cv-02939-JNE-DTS	Benne, Salvatore et al v. 3M Company et al	3/26/2019	4/16/2019		Meshbesher & Spence
0:18-cv-02978-JNE-DTS	Forker, Christine v. 3M Company et al	3/29/2019	4/19/2019		Morris Law Firm

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Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices
(Updated May 10, 2019)

0:18-cv-03082-JNE-DTS	weatherford, Thomas v. 3M Company et al	3/25/2019	4/15/2019		Kennedy Hodges, LLP
0:18-cv-03101-JNE-DTS	Blades, Leanne v. 3M Company et al	4/10/2019	5/1/2019		Davis & Crump, P.C.
0:18-cv-03289-JNE-DTS	Clarkson, Wesley Paul v. 3M	4/5/2019	4/26/2019		Pendley, Baudin & Coffin L.L.P.
0:18-cv-03293-JNE-DTS	Harrison, Michael et al v. 3M Company et al	4/16/2019	5/7/2019		The Miller Firm, LLC
0:18-cv-03370-JNE-DTS	Ruby, Steven et al v. 3M Company et al	3/28/2019	4/18/2019		Kirtland & Packard LLP
Case Number	Title	2nd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:18-cv-00758-JNE-DTS	Butler, Frances Eloise v. 3M Company et al	12/21/2018	1/11/2019	2/15/2019 3/15/2019 4/12/2019	Fears Nachawati, PLLC
0:18-cv-01634-JNE-DTS	Otero, Brenda v. 3M Company et al	12/4/2018	12/25/2018	1/11/2019 2/15/2019 3/15/2019 4/12/2019	Kennedy Hodges, LLP
0:18-cv-01753-JNE-DTS	McCloat, Kenneth v. 3M Company et al	1/2/2019	1/23/2019	2/15/2019 3/15/2019 4/12/2019	Kennedy Hodges, LLP
0:18-cv-02042-JNE-DTS	Buddin, Glen et al v. 3M Company et al	2/27/2019	3/20/2019	4/12/2019	DeGaris & Rogers, LLC
0:18-cv-02061-JNE-DTS	Oedekoven, Cindy v. 3M Company et al	3/6/2019	3/27/2019	4/12/2019	Kennedy Hodges, LLP
0:18-cv-02063-JNE-DTS	Hogue, Anthony v. 3M Company et al	1/14/2019	2/4/2019	2/15/2019 3/15/2019 4/12/2019	Kennedy Hodges, LLP
0:18-cv-02380-JNE-DTS	Foudray, Robert v. 3M Company et al	1/29/2019	2/19/2019	3/15/2019 4/12/2019	Kennedy Hodges, LLP
0:18-cv-02665-JNE-DTS	Romero, Tammy v. 3M Company et al	3/12/2019	3/12/2019	4/2/2019	Kennedy Hodges, LLP
0:18-cv-00093-JNE-DTS	Ashley, Ruth v. 3M Company et al	2/13/2019	3/6/2019		Bernstein Liebhard LLP
0:18-cv-02210-JNE-DTS	Price, Steven v. 3M Company et al	4/12/2019	5/3/2019		Kennedy Hodges, LLP
0:18-cv-02211-JNE-DTS	Rhodes, Sarah v. 3M Company et al	4/3/2019	4/24/2019		Kennedy Hodges, LLP

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Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices
(Updated May 10, 2019)

0:18-cv-02505-JNE-DTS	Campbell, Joan v. 3M Company et al	4/3/2019	4/24/2019		Kennedy Hodges, LLP
0:18-cv-02781-JNE-DTS	Taylor, Michael v. 3M Company	3/1/2019	3/22/2019		Levin, Papantonio, Thomas, Mitchell,
Case Number	Title	3rd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:18-cv-01456-JNE-DTS	Manheim, Kathleen v. 3M Company et al	1/11/2019	2/1/2019	3/15/2019 4/12/2019	Morris Law Firm
0:18-cv-00839-JNE-DTS	Pavia, Johnny et al v. 3M Company et al	3/1/2019	3/22/2019		Fears Nachawati, PLLC
0:18-cv-01819-JNE-DTS	Ryan, Eraron v. 3M Company et al	4/11/2019	5/2/2019		Kennedy Hodges, LLP
0:18-cv-02118-JNE-DTS	Yelverton, Annie v. 3M Company et al	4/16/2019	5/7/2019		The Miller Firm, LLC
0:18-cv-02424-JNE-DTS	Brennan, Daniel v. 3M Company et al	4/3/2019	4/24/2019		Kennedy Hodges, LLP

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Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response
(Updated May 10, 2019)

Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-01654-JNE-DTS	Terrell, Elizabeth v. 3M Company et al	10/11/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019 4/12/2019	Morris Law Firm
0:15-cv-03950-JNE-DTS	LeBlanc, John (Shirley Thibodeaux) v. 3M Company et al	10/8/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019 4/12/2019	Law Offices of Travis Walker, PA
0:17-cv-00712-JNE-DTS	Haladay, Jeffrey (OBO Harold Owens) v. 3M Company	8/3/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019 4/12/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-03573-JNE-DTS	Parker, Lloyd v. 3M Company et al	10/11/2018	1/11/2019 2/15/2019 3/15/2019 4/12/2019	Bernstein Liebhard LLP
0:17-cv-04476-JNE-DTS	Holstine, Rachel v. 3M Company et al	9/12/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019 4/12/2019	Bernstein Liebhard LLP
0:17-cv-04889-JNE-DTS	Thornton, Mildred v. 3M Company et al	12/4/2018	3/15/2019 4/12/2019	Bernstein Liebhard LLP
0:17-cv-05261-JNE-DTS	Hardy, Alan v. 3M Company et al	12/4/2018	3/15/2019 4/12/2019	Bernstein Liebhard LLP
0:18-cv-00141-JNE-DTS	Jacob Fox (Fox, Dean) v. 3M Company et al	2/27/2019	4/12/2019	Langdon and Emison
0:18-cv-00670-JNE-DTS	Darwick, Robert v. 3M Company	7/18/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019 4/12/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A
0:18-cv-00691-JNE-DTS	Hauser, Michael v. 3M Company	6/29/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019 4/12/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, P.A

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Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response
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Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-00724-JNE-DTS	Burr, Cody v. 3M Company et al	12/21/2018	2/15/2019 3/15/2019 4/12/2019	Morris Law Firm
0:18-cv-00856-JNE-DTS	Negron, Angel v. 3M Company et al	2/6/2019	3/15/2019 4/12/2019	The Law offices of Travis R. Walker, P.A.
0:18-cv-00998-JNE-DTS	Caison, John et al v. 3M Company et al	8/22/2018	12/14/2019 11/2019 2/15/2019 4/12/2019	Gustafson Gluek PLLC
0:18-cv-01007-JNE-DTS	Sweezy, Richard v. 3M Company et al	7/24/2018	11/9/2018 12/14/2018 1/11/2019 2/15/2019 4/12/2019	Kennedy Hodges
0:18-cv-01098-JNE-DTS	Rodliff, Peter v. 3M Company	8/15/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019 4/12/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01121-JNE-DTS	Stapley, William v. 3M Company	8/16/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019 4/12/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01130-JNE-DTS	DeLoach, Marsha v. 3M Company et al	8/30/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019 4/12/2019	The Miller Firm, LLC
0:18-cv-01505-JNE-DTS	Cerbins, Rosemary v. 3M Company	7/24/2018	11/9/2018 12/14/2018 1/11/2019 2/15/2019 4/12/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01567-JNE-DTS	Gillis, Stanley v. 3M Company et al	11/1/2018	2/15/2019 3/15/2019 4/12/2019	Kennedy Hodges, LLP
0:18-cv-01722-JNE-DTS	Woodard, George v. 3M Company et al	10/1/2018	2/15/2019 3/15/2019 4/12/2019	Pendley, Baudin & Coffin L.L.P.
0:18-cv-01725-JNE-DTS	Heyward, Jacqueline v. 3M Company et al	10/15/2018	1/11/2019 2/15/2019 3/15/2019 4/12/2019	Kennedy Hodges, LLP

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Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-01766-JNE-DTS	Schoolman, Dale v. 3M Company et al	12/11/2018	2/15/2019 3/15/2019 4/12/2019	GoldenbergLaw, PLLC
0:18-cv-01768-JNE-DTS	Lamb, David v. 3M Company 3M Company et al	12/12/2018	2/15/2019 3/15/2019 4/12/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01769-JNE-DTS	McCoy, Ethel v. 3M Company	8/14/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019 4/12/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01771-JNE-DTS	Royal, Deborah v. 3M Company 3M Company et al	10/8/2018	12/14/2018 1/11/2019 2/15/2019 3/15/2019 4/12/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01832-JNE-DTS	McCray, Abraham v. 3M Company	12/13/2018	2/15/2019 3/15/2019 4/12/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01833-JNE-DTS	Mussachia, Michael v. 3M Company	12/13/2018	2/15/2019 3/15/2019 4/12/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-01875-JNE-DTS	Byrge, Gary v. 3M Company et al	12/12/2018	2/15/2019 3/15/2019 4/12/2019	Morris Law Firm
0:18-cv-02014-JNE-DTS	Johnson, Sheri v. 3M Company et al.	12/3/2018	4/12/2019	Bernstein Liebhard LLP
0:18-cv-02062-JNE-DTS	Pascucci, Michael v. 3M Company et al	11/15/2018	1/11/2019 2/15/2019 3/15/2019 4/12/2019	Kennedy Hodges, LLP
0:18-cv-02099-JNE-DTS	O'Neal, John v. 3M Company et al	11/15/2018	1/11/2019 2/15/2019 3/15/2019 4/12/2019	Kennedy Hodges, LLP
0:18-cv-02102-JNE-DTS	Porter, Kathleen v. 3M Company et al	11/15/2018	1/11/2019 2/15/2019 3/15/2019 4/12/2019	Kennedy Hodges, LLP

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Case Number	Title	Final Deficiency Sent	Prior Listing	Firm Name
0:18-cv-02168-JNE-DTS	Krzeminski, Joseph v. 3M Company et al	2/25/2019	4/12/2019	Brown & Crouppen, PC
0:18-cv-02469-JNE-DTS	Monroe, Trena v. 3M Company	1/31/2019	3/15/2019 4/12/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-02535-JNE-DTS	Guest, Gregory v. 3M Company	1/31/2019	4/12/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-02540-JNE-DTS	Ritzler, Pamela v. 3M Company	3/13/2019	4/12/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-02626-JNE-DTS	Pilcher, Sonja v. 3M Company et al	2/21/2019	4/12/2019	Langdon and Emison
0:18-cv-02776-JNE-DTS	Brown, Hubert v. 3M Company	2/13/2019	4/12/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-02787-JNE-DTS	Willis, Walter v. 3M Company	2/20/2019	4/12/2019	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-02926-JNE-DTS	O'Donnell, Ellen v. 3M Company et al	2/7/2019	4/12/2019	GoldenbergLaw, PLLC
0:18-cv-02947-JNE-DTS	Flenoy, Debra v. 3M Company et al	2/12/2019	4/12/2019	GoldenbergLaw, PLLC
0:18-cv-02029-JNE-DTS	Frey, Marcia v. 3M Company et al	3/13/2019		Capretz & Associates
0:18-cv-02080-JNE-DTS	McGuire, Maria v. 3M Company et al	11/15/2018		Kennedy Hodges, LLP
0:18-cv-02529-JNE-DTS	Chavez, Kimberly v. 3M Company et al	3/29/2019		GoldenbergLaw, PLLC
0:18-cv-02768-JNE-DTS	Jones, Inez v. 3M Company et al	3/6/2019		Brown and Crouppen, P.C.

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0:18-cv-02779-JNE-DTS	Edwards, Lucinda v. 3M Company	3/21/2019		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:18-cv-03284-JNE-DTS	Hampton, Ronald v. 3M Company et al	2/26/2019		Pendley, Baudin & Coffin L.L.P.

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